

# Robert W. Seiden

Court-Appointed Temporary Receiver for Link Motion Inc.  
Pursuant to The Honorable Judge Victor Marrero of the  
United States District Court, Southern District of New York

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Hon. Victor Marrero  
United States Courthouse  
Southern District of New York  
500 Pearl Street, Suite 1040  
New York, New York 10007

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April 25, 2019

**Re: Wayne Baliga v. Link Motion Inc. et al. 1:18-cv-11642**

Dear Honorable Judge Marrero,

I am Steven E. Seiden, counsel to the Court Appointed Temporary Receiver for Link Motion, Inc. This letter is in response to Mr. Maloney's letter to your honor dated April 25, 2019, wherein Defendant Shi through his counsel Mr. Maloney requested that the Court issue a protective order with respect to Mr. Shi.

I would like to simply correct certain facts as outlined in Mr. Maloney's letter. First, I am counsel to the Receiver, not Plaintiff's counsel. Second, a demand letter (not a subpoena) was mailed to Google in the ordinary course of my duties to assist the Receiver in identifying and securing Link Motion, Inc. assets in accordance with the Court's Order Appointing Receiver. Google responded to that request and indicated that Link Motion, Inc. "runs an App" on Google that is in fact an asset of Link Motion, Inc. and apparently generates revenue from the operation of that App. The demand letter to Google did not request or seek email accounts or information related to email accounts of Mr. Shi or anyone else. The request to Google for information related to identifying possible assets of Link Motion, Inc. was made in the ordinary course of the Receivership.

Please let me know if your honor wishes to discuss any of the above, and thank you for your prompt attention to this matter.

Respectfully submitted,

Steven E. Seiden, Esq.

On behalf of the Court-Appointed Temporary Receiver for  
Link Motion, Inc.

The Clerk of Court is directed to enter into the public record  
of this action the letter above submitted to the Court by The  
Counsel to the Temporary Receiver.

**SO ORDERED.**

4-26-19

DATE

VICTOR MARRERO, U.S.D.J.